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April 30, 2007

The Honorable Kevin J. Martin
Chairman
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

RE: *In the Matter of Numbering Resource Optimization CC Docket No. 99-200, Order and Fifth Further Notice of Proposed Rulemaking, Docket No. FCC-06-14; Federal Communications Commission Seeks Comment on Initial Regulatory Flexibility Analysis in Telephone Number Portability Proceeding, CC Docket No. 95-116; and Universal Service Contribution Methodology, WC Docket No. 06-122*

Dear Chairman Martin:

We write to reiterate the Iowa Utilities Board's support for a number of proceedings currently pending before the Commission that relate to numbering. We encourage the FCC to move as quickly as possible on these issues to mitigate continued strains on numbering resources in Iowa caused by delayed action in these proceedings.

Recent activities by a voice over Internet service provider, partnering with rural ILECs, providing free voice mail boxes to customers nationwide via the Internet has had a dramatic impact on numbering resources in two of Iowa's area codes. To date, 191 NXX codes, or nearly 2 million numbers have been assigned in just 16 rate centers in Iowa. The populations of these rate centers range from 145 to 2023 people. As a result, the most recent NANPA exhaust projections approved by the FCC show that the forecasted exhaust dates in two of Iowa's area codes have moved up by 10 to 15 years between the projections of March, 2006 and March, 2007. If this trend continues, the NANPA believes at least one of Iowa's area codes could be declared in "jeopardy" by the end of 2007 or early 2008.

The Board has continued to work with these providers to express our concern of the potential for accelerated need for area code relief and its impact on Iowa consumers. Unfortunately, our tools for controlling this problem are somewhat limited.

There are proceedings before the FCC that we believe would help in addressing this problem in Iowa, and other states. In particular, the Iowa Utilities Board requests the FCC act quickly in Docket No. FCC-06-14 and grant to the state commissions delegated authority to implement Thousands Block Number Pooling (TBNP) in all exchanges. Related to that, we encourage the FCC to expeditiously complete the Regulatory Flexibility Analysis ordered by the 11th Circuit in the Number Portability proceeding. This will allow Iowa, and other states, to move

The Honorable Kevin J. Martin
April 30, 2007
Page 2

ahead with implementing LNP in all areas. It is our understanding that the switch upgrades necessary for LNP also facilitate TBNP. Having the ability to order TBNP statewide will give the Board another tool in ensuring efficient use of numbering resources in Iowa.

We would also encourage the FCC to continue to explore a numbers or connections-based contribution methodology for the Universal Service Fund. Currently companies like those in Iowa that are utilizing large amounts of numbers pay nothing for those numbers when assigned from NANPA. Implementing a numbers based contribution methodology could force companies to be more conservative in their requests for numbers, or otherwise remove opportunities for arbitrage that exists under the current policy of giving numbers away for free.

While we appreciate there are a number of pressing issues facing the FCC, it is imperative that action be taken on the items mentioned above in order to ensure the nation's numbering resources are utilized in the most efficient manner possible. Thank you for your consideration of this matter, and we look forward to continuing to work with you on these and other matters of mutual interest.

Sincerely,



John R. Norris
Chairman



Curt Stamp
Board Member



Krista K. Tanner
Board Member

cc: The Honorable Michael J. Copps
The Honorable Jonathan S. Adelstein
The Honorable Deborah Taylor Tate
The Honorable Robert M. McDowell
Thomas Navin, Chief, Wireline Competition Bureau